Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Keymark Corporation of Florida
2540 Knights Station Road
Lakeland, Florida 33810

Authorized Representative:
Joseph R. Crenna, Vice President

Air Permit No. 1050320-017-AC
Permit Expires: 12/31/2017
Minor Air Construction Permit

Keymark Corporation - Lakeland Plant
Construction of Cast House Operation

PROJECT

This is the final air construction permit, which authorizes the construction of a cast house operation adjacent to the existing aluminum extrusion facility to manufacture cylindrical aluminum billets or logs needed for the extrusion presses at the facility from aluminum scrap, ingots or bars. The proposed work will be conducted at the existing Keymark Corporation - Lakeland Plant, which is an aluminum extruded products facility categorized under Standard Industrial Classification No. 3354. The existing facility is located in Polk County at 2540 Knights Station Road in Lakeland, Florida. The UTM coordinates are Zone 17, 402.03 km East and 3106.24 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

for

Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Joseph R Crenna, Keymark Corporation of Florida, jcrenna@keymarkcorp.com
Charles David Turley, PE, cdt@yahoo.com
Javier Ramirez, Florida DEP Southwest District, javier.ramirez@dep.state.fl.us
Danielle Henry, FDEP SWD danielle.d.henry@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Cathy Rodriguez December 29, 2016
(Clerk) (Date)

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 1050320	
ID No.	**Emission Unit Description**
001	Al Extrusion & Painting Operations: 6 Paint Spray Booths
003	Paint Hook Cleaning Incinerator
002	Natural Gas Fired Ovens and Heaters w/ Regenerative Thermal Oxidizer (RTO) (unregulated)
004	Sludge Dryer (unregulated)

PROPOSED PROJECT

Construction of a cast house operation adjacent to the existing aluminum extrusion facility to manufacture cylindrical aluminum billets or logs needed for the extrusion presses at the facility from aluminum scrap, ingots or bars.

This project will add the following emissions units.

Facility ID No. 1050320	
ID No.	**Emission Unit Description**
005	Aluminum Decoating Ovens Nos. 1 & 2 with afterburners
006	Group 2 Aluminum Melting Furnaces Nos. 1 & 2
007	In-Line Molten Aluminum Degassing System w/o reactive fluxing
008	Billet Casting, Homogenizing and Cutting

EXEMPT EMISSION SOURCES/ACTIVITIES

- Raw material receiving, inspection, and sorting operations to insure that the Cast House will not accept any aluminum scrap contaminated with plastics or rubber. Rule 62-4.040(1)(b), F.A.C. (insignificant emissions)
- Inline Filtration system to remove unwanted inclusions from the molten aluminum before casting. Rule 62-4.040(1)(b), F.A.C. (insignificant emissions)

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This permit is a stand-alone construction permit for the construction and initial operation of additional emission units at an existing facility. Also reference current Operation Permit 1050320-016-AV.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air and Solid Waste Permitting Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air_Permitting@dep.state.fl.us

   All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Compliance Assurance Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air@dep.state.fl.us

3. Appendices: The following Appendices are attached as a part of this permit:
   - Appendix A (Citation Formats and Glossary of Common Terms);
   - Appendix B (General Conditions);
   - Appendix C (Common Conditions); and
   - Appendix D (Common Testing Requirements).
   - NESHAP 40 CFR 63 Subpart A
   - NESHAP 40 CFR 63 Subpart RRR

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

[Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires.
[Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Application for Title V Air Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air operation permit, the applicant shall submit the following:
   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;
   b. a copy of the initial compliance test report required by Specific Condition No. A.18., if not previously submitted;
   c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.19 - A.23.; and
   d. the proposed (OM & M) Plan specified in Specific Condition A.24.

   The application shall be submitted to the Permitting Authority.

   [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

9. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are

subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)] *{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}*

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

A. EU Nos. 005, 006, 007 & 008, Cast House Operation

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
005	Aluminum Decoating Ovens with Afterburners: Two Almex ALM-DQL-12-930 natural gas fired decoating ovens to remove organic contaminants such as oils, paint, lacquer, and ink from scrap aluminum. The average batch time for each decoating oven is six hours and the maximum batch size is 24,000 lb per oven. Each oven has an after burner and exhaust stack. The after burners have a fuel firing rate of 1.5 MMBtu/hr each and a design residence time of at least one second at a temperature of 1400° F
006	Group 2 Aluminum Melting Furnaces: Two Almex RV-FNC-110Kib natural gas fired reverberatory melting furnaces which will only process clean charge and will not use reactive flux agents. Each furnace is equipped with low NO_x regenerative burners and an exhaust stack. The average batch time for each melting furnace is 11.5 hours and the maximum batch size is 88,000 lb. Group 2 furnace means a furnace of any design that melts, holds, or processes only clean charge and that performs no fluxing or performs fluxing using only nonreactive, non-HAP-containing/non-HAP-generating gases or agents.
007	In-Line Molten Aluminum Degassing System w/o reactive fluxing: An Almex LARS-RL-T8 inline degassing system which will use Argon to removed unwanted gases from the molten aluminum before casting.
008	Billet Casting, Homogenizing and Cutting: An Almex 40KLB-CTM water cooled billet casting system to cast the cylindrical aluminum billets or logs needed for the extrusion presses, two Almex HF-TRV-90K natural gas fired homogenizing furnaces to eliminate any interior stresses and nonuniform metallurgical structures that are generated during casting and an Almex billet cutting system equipped with automatic saws to produce aluminum extrusion logs of the lengths necessary for the extrusion presses.

FEDERAL REGULATIONS

A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart A – General Provisions and Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, which is adopted by reference in Rule 62-204.800, F.A.C. The requirements listed below are based on the air construction permit application dated April 11, 2016.
[Rule 62-204.800(11)(b)54., F.A.C.; 40 CFR 63, Subparts A and RRR]

40 CFR 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production - Applicable Provision Requirements

Based on Federal Register version dated 09/18/2015.

EU-005 Aluminum Decoating Ovens with Afterburners

§63.1500 Applicability.
§63.1501 Dates.
§63.1503 Definitions.
EMISSION STANDARDS AND OPERATING REQUIREMENTS
§63.1505 Emission standards for affected sources and emission units.
§63.1506 Operating requirements.
MONITORING AND COMPLIANCE REQUIREMENTS
§63.1510 Monitoring requirements.
§63.1511 Performance test/compliance demonstration general requirements.
§63.1512 Performance test/compliance demonstration requirements and procedures.
§63.1513 Equations for determining compliance.
NOTIFICATIONS, REPORTS, AND RECORDS

§63.1515 Notifications.
§63.1516 Reports.
§63.1517 Records
OTHER
§63.1518 Applicability of general provisions.

EU-006 Aluminum Melting Furnaces (Group 2 Using Clean Charge Only and No Reactive Flux)
§63.1500 Applicability.
§63.1501 Dates.
§63.1503 Definitions.
EMISSION STANDARDS AND OPERATING REQUIREMENTS
§63.1506 Operating requirements.
MONITORING AND COMPLIANCE REQUIREMENTS
§63.1510 Monitoring requirements.
§63.1511 Performance test/compliance demonstration general requirements.
§63.1512 Performance test/compliance demonstration requirements and procedures.
NOTIFICATIONS, REPORTS, AND RECORDS
§63.1515 Notifications.
§63.1516 Reports.
§63.1517 Records
OTHER
§63.1518 Applicability of general provisions.

EU-007 In-Line Molten Aluminum Degassing System (With No Reactive Fluxing)
§63.1500 Applicability.
§63.1501 Dates.
§63.1503 Definitions.
EMISSION STANDARDS AND OPERATING REQUIREMENTS
§63.1505 Emission standards for affected sources and emission units.
§63.1506 Operating requirements.
MONITORING AND COMPLIANCE REQUIREMENTS
§63.1510 Monitoring requirements.
§63.1511 Performance test/compliance demonstration general requirements.
§63.1512 Performance test/compliance demonstration requirements and procedures.
NOTIFICATIONS, REPORTS, AND RECORDS
§63.1515 Notifications.
§63.1516 Reports.
§63.1517 Records
OTHER
§63.1518 Applicability of general provisions.

A. EU Nos. 005, 006, 007 & 008, Cast House Operation

EQUIPMENT

A.2. Cast House Operation: The permittee is authorized to install two Almex ALM-DQL-12-930 (or equivalent) natural gas fired decoating ovens to remove organic contaminants such as oils, paint, lacquer, and ink from scrap aluminum (EU No. 005), two Almex RV-FNC-110Kib (or equivalent) natural gas fired reverberatory melting furnaces which will only process clean charge and will not use reactive flux agents (EU No. 006), an Almex LARS-RL-T8 (or equivalent) inline degassing system which will use Argon to removed unwanted gases from the molten aluminum before casting (EU No. 007), an Almex Model CFF-20x20 (or equivalent) inline filtration system to remove unwanted inclusions from the molten aluminum before casting and a billet casting system consisting of an Almex 40KLB-CTM (or equivalent) water cooled billet casting system to cast the cylindrical aluminum billets or logs needed for the extrusion presses, two Almex HF-TRV-90K (or equivalent) natural gas fired homogenizing furnaces to eliminate any interior stresses and non-uniform metallurgical structures that are generated during casting and an Almex (or equivalent) billet cutting system equipped with automatic saws to produce aluminum extrusion logs of the lengths necessary for the extrusion presses (EU No. 008).
[Application No. 1050320-017-AC]

{Permitting Note: The permittee currently plans to construct the cast house with only one decoating furnace, with a second to be added later. Two decoating ovens are permitted with this project to simplify future permitting actions.}

PERFORMANCE RESTRICTIONS

A.3. Permitted Capacity:

a. The maximum throughput of aluminum scrap in each decoating oven of EU No. 005 shall not exceed 96,000 lb/day or 16,125 ton/yr.

b. The maximum throughput of aluminum in each melting furnace of EU No. 006 shall not exceed 183,652 lb/hr or 25,800 ton/yr.

[Application No. 1050320-017-AC; Rule 62-210.200(PTE), F.A.C.]

A.4. Authorized Fuel: These emission units shall use natural gas only.
[Application No. 1050320-017-AC and Rule 62-210.200(PTE), F.A.C.]

A.5. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.6. Labeling: The owner or operator must provide and maintain easily visible labels posted at each emission unit listed in this section that identifies the applicable emission limits and means of compliance, including:

a. The type of affected source or emission unit (decoating kiln, group 2 furnace or in-line fluxer).

b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (*e.g.*, clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

c. The afterburner operating temperature and design residence time (for EU No. 005 only).

The labels shall be inspected at least once per calendar month to confirm that posed labels are intact and legible.

[40 CFR 63.1506(b) and 1510(c)]

A.7. Feed/charge weight: The operator must operate a weight measurement system or other weight determination procedure in accordance with the OM&M plan by:

a. Installing and operating a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; or

b. The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:

1. The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and

2. All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.

[40 CFR 63.1506(d)]

A.8. Group 2 Aluminum Melting Furnaces: EU No. 006 shall not use reactive flux agents and will be charged only with clean charge. Clean charge means furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or higher; and runaround scrap. Anodized aluminum that contains dyes or sealants containing organic compounds is not clean charge.
[Application No. 1050320-017-AC; 40 CFR 63.1503, Definitions of Clean Charge and Group 2 Furnace]

A.9. In-Line Molten Aluminum Degassing System: Only nonreactive, non-HAP-containing, non-HAP-generating flux gases, agents, or materials may be used in EU No. 007.
[Application No. 1050320-017-AC; 40 CFR 63.1506(l)]

EMISSIONS STANDARDS

A.10. Emissions Standards:

Unit	VOC (THC as propane)	PM/PM10	D/F TEQ	HCl	VE
005	0.20 lb/ton 0.40 lb/hr 1.61 ton/year	0.40 lb/ton 3.0 lb/hr 2.42 ton/yr	7.0E-05 gr/ton 2.00E-08 lb/hr 8.06E-08 ton/yr	0.20 lb/ton 0.40 lb/hr 1.61 ton/yr	5%
006	n/a	0.40 lb/ton 8.25 lb/hr 36.12 ton/yr	n/a	n/a	20%

[Application No. 1050320-017-AC; 40 CFR 63.1505(e); and Rules 62-296.401 and 62-296.320, F.A.C.]

TESTING REQUIREMENTS

A.11. Initial Compliance Tests: Each oven of EU No. 005 shall be tested at the outlet of the control device to demonstrate initial compliance with the emissions standards for THC, D/F, HCl and PM. Each furnace of EU No. 006 shall be tested to demonstrate initial compliance with the emissions standards for PM. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

A.12. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(9), F.A.C.]

A.13. For EU No. 005 the average afterburner operating temperature in each 3-hour block period must be maintained at or above 760 °C (1400 °F) for the test

A.14. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions
9	Visual Determination of the Opacity of Emissions from Stationary Sources
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)
23	Determination of Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans From Stationary Sources
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)
26A	Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources - Isokinetic Method Note: Method 26 - Determination of Hydrogen Chloride Emissions From Stationary Sources may also be used, except at sources where entrained water droplets are present in the emission stream.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

A.15. Feed/charge weight: The permittee must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the permitting authority for major sources, or the Administrator for area sources to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.
[40 CFR 63.1510(e)]

A.16. After burner: For each decoating oven of EU No. 005, the owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems. The temperature monitoring device must meet each of these performance and equipment specifications:

a. The temperature monitoring device must be installed at the exit of the combustion zone of each afterburner.

b. The monitoring system must record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.

c. The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in §63.1512(m).

d. The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

[40 CFR 63.1510(g)]

NOTIFICATION REQUIREMENTS

A.17. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 005, 006 and/or 007 after completing the construction authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDS AND REPORTS

A.18. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the following:

a. The total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.

b. For each decoating oven of EU No. 005:

i. The operating temperature of each afterburner every 15 minutes during the THC and D/F performance tests

ii. The 15-minute block average temperatures for the three test runs; and

iii. The 3-hour block average temperature measurements for the 3 test runs.

[40 CFR 63.1512; Rule 62-297.310(10), F.A.C.]

A.19. Operational Data, EU No. 005: The permittee shall monitor the temperature at the exit of the combustion zone of each afterburner of EU No. 005 continuously by the cast house data acquisition system, which will calculate and record 15 minute block averages and the average temperature for each 3-hour block period. Then afterburners will be inspected at least annually as required by 40 CFR 63 Subpart RRR

A.20. Operational Data, EU No. 006: For each furnace of EU No. 006, the permittee shall:

a. Record a description of the materials charged to each furnace, including any nonreactive, non-HAP-containing/non-HAP-generating fluxing materials or agents.

b. Submit a certification of compliance with the applicable operational standard for charge materials in §63.1506(o) for each 6-month reporting period. Each certification must contain the information in §63.1516(b)(2)(v).

[40 CFR 63.1510(r)]

A.21. Certification, EU No. 007: The owner or operator of an in-line fluxer that uses no reactive flux materials must submit a certification of compliance with the operational standard for no reactive flux materials in §63.1506(l) for each 6-month reporting period. Each certification must contain the information in §63.1516(b)(2)(vi).
[40 CFR 63.1510(m)]

A.22. Daily Log for PM, HCl, and D/F Emissions: Except as provided in paragraph (u) of this section, the owner or operator must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the owner or operator must:

a. Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in paragraph (e) of this section. If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.;

b. Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds.;

c. Where no performance test has been conducted, for a particular emission unit, because the owner of operator has, with the approval of the permitting authority, chosen to determine the emission rate of an emission unit by testing a representative unit, in accordance with §63.1511(f), the owner or operator shall use the emission rate determined from the representative unit in the SAPU emission rate calculation required in §63.1510(t)(4).

d. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.

e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3. The SAPU is in compliance with an applicable emission limit if the 3-day, 24-hour rolling average for each pollutant is no greater than the applicable SAPU emission limit determined in accordance with §63.1505(k)(1)-(3)

f. As an alternative to the procedures of a-e of this condition, the permittee may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

[40 CFR 63.1510(t) & 1510(u)]

The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

A.23. Operational Records: the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart

a. For each affected source with emissions controlled by an afterburner:

i. Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken; and

ii. Records of annual afterburner inspections.

b. For each scrap dryer/delacquering kiln/decoating kiln and group 1 furnace, subject to D/F and HCl emission standards with emissions controlled by a lime-injected fabric filter, records of 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the 3-hour block average temperature exceeds the compliant operating parameter value + 14 °C (+ 25 °F), with a brief explanation of the cause of the excursion and the corrective action taken.

c. For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

d. For each in-line fluxer for which the owner or operator has certified that no reactive flux was used:

i. Operating logs which establish that no source of reactive flux was present at the in-line fluxer;

ii. Labels required pursuant to §63.1506(b) which establish that no reactive flux may be used at the in-line fluxer; o

iii. Operating logs which document each flux gas, agent, or material used during each operating cycle.

e. Records of all charge materials and fluxing materials or agents for a group 2 furnace.

f. Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.

g. For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

h. For any failure to meet an applicable standard, the owner or operator must maintain the following records

i. Records of the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken

ii. Records of actions taken during periods of malfunction to minimize emissions in accordance with §§63.1506(a)(5) and 63.1520(a)(8), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.1517]

A.24. <u>Operation and Maintenance and Monitoring (OM & M) Plan</u>: The applicant must prepare and implement a written OM&M plan for each emission unit in this section. The applicant must submit the OM&M plan to the permitting authority within 90 days after a successful initial performance test under §63.1511(b), or within 90 days after the compliance date established by §63.1501(b) if no initial performance test is required. The plan must be accompanied by a written certification by the applicant that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The owner or operator must comply with all of the provisions of the OM&M plan as submitted to the permitting authority, unless and until the plan is revised in accordance with the following procedures. If

the permitting authority determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the applicant must promptly make all necessary revisions and resubmit the revised plan. If the applicant determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the owner or operator submits a description of the changes and a revised plan incorporating them to the permitting authority. The plan must contain the following information:

a. The identification of each emission unit in the secondary aluminum processing unit.

b. The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application.

c. The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit.

d. Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart.

e. The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in §63.1510(t).

f. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

g. A monitoring schedule for each affected source and emission unit.

h. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in §63.1505.

i. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

    i. Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and

    ii. Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR 63 Subpart A.

j. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.

k. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in bullet a. of this condition, including:

    i. Procedures to determine and record the cause of any deviation or excursion, and the time the deviation or excursion began and ended; and

    ii. Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

l. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

m. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits

[Application No. 1050320-017-AC; 40 CFR 63.1510(b) & (s)]